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CELA
July 6, 2017

VIA email to CELA@fec.gov

General Counsel's Office:
c/o Jeff S. Jordan, Esq.
Supervisory Attorney
Complaints Examination & Legal Administration
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Response of Senator C. Ellis Black
MUR 7246

Dear Mr. Jordan:

We represent State Senator C. Ellis Black. An executed Designation of Counsel form is attached. This letter is Senator Black's response to the complaint filed by Lisa M. Ring ("the Complainant") against Congressman Buddy Carter, his federal committee, Buddy Carter for Congress ("BCC"), Congressman Carter's former state Senate committee, and several Georgia state campaign committees, including Senator Black ("the Complaint").

On June 6, 2017, Senator Black requested a 45-day extension of time to respond. We understand that only a 30-day extension was permitted. This response is filed within that timeframe.

The Complainant is the Bryan County, Georgia Democratic Party Chair; she filed the complaint just a few weeks before she announced her intention to run against Congressman Carter in 2018 for Georgia's First Congressional District. The Complainant raises a completely baseless claim against Senator Black and Congressman Carter. In a nutshell, she asserts – without any basis whatsoever other than the timing of contributions (which is insufficient, as discussed below) that Congressman Carter's state Senate campaign made an unlawful contribution to Senator Black's state Senate campaign and that Senator Black's State House campaign made an unlawful contribution to Congressman Carter's Congressional campaign. Both statements are false.

As shown below, the complaint contains no factual support but is based solely on speculation and innuendo, which is specifically refuted. There is no legal basis for

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proceeding further, as the Federal Election Commission (the "Commission") may find "reason to believe" only if a Complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the Federal Election Campaign Act (the "Act"). See 11 CFR § 111.4(a), (d). Unwarranted legal conclusions from asserted facts or mere speculation will not be accepted as true. See MUR 4960, Commissioners Mason, Sandstrom, Smith and Thomas, Statement of Reasons (Dec. 21, 2001). Moreover, the Commission will dismiss a complaint when the allegations are refuted with sufficiently compelling evidence. See *id.* For all these reasons, the complaint should be immediately dismissed.

Contrary to the Complainant's assertions, the facts are as follows: From 2006 to 2014, Senator Black served in the Georgia House of Representatives. During part of that time (2006-2010), one of his colleagues in the Georgia House was Congressman Carter. In 2010, Congressman Carter ran for and was elected to the Georgia State Senate. In March 2014, Congressman Carter qualified to run for Georgia's First Congressional District. After prevailing in a primary runoff in July 2014, he was elected to Congress in November 2014.

In 2014, Senator Black also elected to run for a different office. He qualified to run for State Senate District 8 in March 2014 and was elected to that position in November 2014.

Thus, in 2014, both Senator Black and Congressman Carter had opted to run for different offices. However, both still had excess funds in the campaign accounts for their then-current offices (State House – Black and State Senate – Carter). Under Georgia law, those excess contributions can only be disposed in one of these ways: (1) to a charitable organization as defined by 26 U.S.C. §170(c) as that statute existed on March 1, 1986 and additionally may include educational, eleemosynary, and nonprofit organizations; (2) to any national, state, or local political party or to any candidate, with the exception of the future campaigns of the contributing candidate for a different office; (3) to any contributor to the campaign so long as the refund does not exceed the amount that contributor gave; and (4) to repay a prior campaign obligation incurred by the candidate. O.C.G.A. §21-5-33(b) (2008). As the disclosure report attached at Tab 1 shows, Senator Ellis had sufficient campaign funds to render those funds "excess" and therefore, his campaign's contribution to Congressman Carter's Congressional campaign was permissible under state law. Furthermore, while the Complainant contends there wasn't an "accounting" done to ensure that there were sufficient personal contributions in accounts including Senator Black's, a review of Senator Black's disclosure report at the time of the contribution shows the campaign clearly had sufficient personal contributions to make the \$500 contribution to Congressman Carter's Congressional campaign.

The Complainant, however, falsely asserts that Congressman Carter made earmarked contributions to his Congressional campaign through a "conduit scheme" with Senator Black and others, resulting in illegal transfers to the Carter Congressional

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campaign 11 CFR § 110.3(d). Such contentions are wrong, as a matter of both fact and law.

A contribution is earmarked only when there is "a designation, instruction, or encumbrance, whether direct or indirect, express or implied, oral or written, which results in all or any part of a contribution or expenditure being made to, or expended on behalf of, a clearly identified candidate or a candidate's authorized committee." 11 CFR § 110.6(b). In the past, the Commission has determined that contributions were earmarked when there was clear documentary evidence demonstrating a designation or instruction by the donor. *See* MURs 4831/5274 (Nixon) (finding contributions were earmarked where checks contained express designations on memo lines); *see also*, MUR 5732 (Matt Brown for U.S. Senate), MUR 5520 (Republican Party of Louisiana/Tauzin), MUR 5445 (Davis), MUR 4643 (Democratic Party of New Mexico) (rejecting earmarking allegations where there was no evidence of a clear designation, instruction, or encumbrance by the donor), and MUR 5125 (Perry) (finding no earmarking because the complaint contained only bare allegations of earmarking, but showed no designation, instruction or encumbrance). The Commission has rejected earmarking claims even where the timing of the contributions at issue appeared to be a significant factor, but the contributions lacked a clear designation or instruction. *See* MUR 5445 (Davis) and MUR 4643 (Democratic Party of New Mexico).

In this case, the Complainant provides no support whatsoever that the Carter Senate campaign made the "designations, instructions and encumbrances" required for a violation of 52 U.S.C. § 30116(a)(8) and 11 CFR § 110.6(b)(1), when making its contribution to Senator Black. The contribution check from the Carter Senate campaign to Senator Black's campaign did not contain any designations or instructions, and was not accompanied by any sort of documentation indicating how the contribution should be used. Moreover, the Carter Senate campaign did not make any other express or implied, or written or oral instructions or designations to Senator Black or his campaign when making the contribution. The Complainant's argument rests solely on the timing of the contributions; this line of reasoning, based exclusively on the timing of contributions, has been explicitly rejected by the Commission in the numerous enforcement matters referenced above. *See* MUR 5445 (Davis) and MUR 4643 (Democratic Party of New Mexico).

Both candidates elected to make contributions from their soon-to-be former campaign accounts to other candidates, one of the permitted ways of disposing excess campaign contributions in Georgia. The fact that they contributed to each other's new campaigns is hardly suspicious and is certainly not illegal. They had been colleagues in the state House; they had both elected to run for new offices; each faced opposition, and, in fact, Congressman Carter was also in a primary runoff; and, in their new positions, Congressman Carter's Congressional District would include Senator Black's new Senate District, so they would share constituents. The Supreme Court has made clear that "government regulation may not target the general gratitude a candidate may feel toward those who support him or his allies." *McCutcheon v. Federal Election Comm'n*,

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134 S.Ct. 1434, 1441 (2014) (citing *Citizens United v. Federal Election Comm'n*, 558 U. S. 310, 360 (2010)).

In summary, the Complainant charges, without any basis in fact, that there was an "illegal conduit scheme" between Congressman Carter and others, including Senator Black. As shown above, that allegation is simply false. There is no evidence of any such agreement – nor was there such an agreement – between Congressman Carter and Senator Black.

As a matter of law, the Complainant has completely failed to demonstrate that the any violation of the Act or the Commission's regulations. There is no violation of federal law (nor state law for that matter). Rather, this complaint was filed for the worst possible reason: the Complainant's attempt to raise a purported "ethics violation" on the part of Congressman Carter and hope to advance her campaign that way. The complaint is based on malicious speculation and frivolous legal theories, with clearly no concern for the collateral damage to Senator Black and others.

We therefore respectfully request that the Commission recognize the legal and factual insufficiency of the complaint on its face and immediately dismiss it.

Sincerely,

STRICKLAND BROCKINGTON LEWIS LLP


Anne W. Lewis

Enclosure: as stated

cc: Senator C. Ellis Black



FEDERAL ELECTION COMMISSION
 999 E Street, NW
 Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

FAX 202-219-3923

MUR # 7246

Name of Counsel: Anne W. Lewis

Firm: Strickland Brockington Lewis LLP

Address: Midtown Proscenium Suite 2200
1170 Peachtree St NE Atlanta Ga 30309-7200

Telephone: 678-347-2200 Fax: 678-347-2210

E-mail: anne.lewis@sbllaw.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

7-5-17 Calvin Black Senator
 Date: Signature (Respondent/Agent) Title

RESPONDENT: Calvin Ellis Black
 (Committee Name/ Company Name/ Individual Named in Notification Letter)

Mailing Address: 5900 Jumping Jilly Rd
 (Please Print) Kalidosta, Ga 31601

Telephone (H): _____ (W): _____

E-mail: _____

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(2)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

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TAB 1

CONFIDENTIAL

**State of Georgia
Campaign Contribution Disclosure Report
Summary Report**

CONTRIBUTIONS RECEIVED

1	I Have: The following contributions, including Common Source, to report:	<u>In-Kind Estimated Value</u>	<u>Cash Amount</u>
2	Total contributions previously reported.	\$0.00	\$101,500.14
3	Total amount of all itemized contributions received in this reporting period which are listed on the "Itemized Contributions" page.	\$0.00	\$81,876.14
3a	All loans received this reporting period.		\$0.00
3b	Interest earned on campaign account this reporting period.		\$0.00
3c	Total amount of investments sold this reporting period.		\$0.00
3d	Total amount of cash dividends and interest paid out this reporting period.		\$0.00
4	Total amount of all separate contributions of \$100.00 or less received in this reporting period and not listed on the "Itemized Contributions" page. "Common Source" contributions must be aggregated on the "Itemized Contributions"	\$0.00	\$1,300.00
5	Total contributions reported this reporting period. (Line 3 + 3a + 3b + 3c + 3d + 4)	\$0.00	\$83,176.14
6	Total contributions to date. (Line 2 + 5)	\$0.00	\$184,676.28

EXPENDITURES MADE

7	I Have: The following expenditures to report:	<u>In-Kind Estimated Value</u>	<u>Cash Amount</u>
8	Total expenditures made and reported prior to this reporting period.	\$0.00	\$405.00
9	Total amount of all itemized expenditures made in this reporting period which are listed on the "Itemized Expenditures" page.	\$0.00	\$101,815.08
10	Total amount of all separate expenditures of \$100.00 or less each that were made in this reporting period and not listed on the "Itemized Expenditures" page.	\$0.00	\$1,920.87
11	Total expenditures reported this reporting period. (Line 9 + 10)	\$0.00	\$103,735.95
12	Total expenditures to date. (Line 8 + 11)	\$0.00	\$104,140.95

INVESTMENTS

13	Amount of investments at the beginning of this reporting period.		\$0.00
14	Total amount of investments at the close of this reporting period.		\$0.00

15	Net Balance On Hand. (Line 6 - 12 + 14)		\$80,535.33
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**State of Georgia
Campaign Contribution Disclosure Report
Outstanding Indebtedness**

Primary 2014 Indebtedness		<u>Amount</u>
1	Outstanding indebtedness at the beginning of this reporting period.	\$100,000.00
2	Loans received this reporting period.	\$0.00
3	Deferred payments of expenses this reporting period.	\$0.00
4	Payments made on loans this reporting period.	\$7,250.00
5	Credits received on loans/deferred payments this reporting period.	\$0.00
6	Payments this period on previously deferred expenses.	\$0.00
7	Total indebtedness at the close of this reporting period. (line 1 + 2 + 3 - 4 - 5 - 6)	\$92,750.00
Run-Off Primary 2014 Indebtedness		<u>Amount</u>
1	Outstanding indebtedness at the beginning of this reporting period.	\$92,750.00
2	Loans received this reporting period.	\$0.00
3	Deferred payments of expenses this reporting period.	\$0.00
4	Payments made on loans this reporting period.	\$0.00
5	Credits received on loans/deferred payments this reporting period.	\$0.00
6	Payments this period on previously deferred expenses.	\$0.00
7	Total indebtedness at the close of this reporting period. (line 1 + 2 + 3 - 4 - 5 - 6)	\$92,750.00

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Athens Vascular Surgery, P. C. 195 King Ave. Athens, ga 30606	06/14/2014 Monetary		2014 Run-Off Primary	\$1,300.00	\$0.00
Automobile Dealers Association, Inc PAC Account 6903-A oak Ridcge Commerce Way SW Austell, ga 30168	04/25/2014 Monetary		2014 Primary	\$500.00	\$0.00
Bcvpac 50 Hurt Plaza SE, Ste 935 Atlanta, ga 30303	04/26/2014 Monetary		2014 Primary	\$500.00	\$0.00
Boston Gin Co. P. O. Box 340 Boston, ga 31626	05/25/2014 Monetary		2014 Primary	\$1,000.00	\$0.00
Brooksc Dairy, LLC P. O. Box 508 Quitman, ga 31643	06/16/2014 Monetary		2014 Primary	\$1,000.00	\$0.00
Bullard, Brock 800 Weeping Willow Dr. Powder Springs, ga 30127	05/13/2014 Monetary	a. CPA b. Self	2014 Primary	\$200.00	\$0.00
C. A. R. D. of Georgia P. O. Box 725154 Atlanta, ga 31139	06/24/2014 Monetary		2014 Run-Off Primary	\$500.14	\$0.00
Cable Television Association of Georgia, PAC Inc. 34 Peachtree St. Ste. 1900 Atlanta, ga 30303	06/24/2014 Monetary		2014 Run-Off Primary	\$500.00	\$0.00
Callicutt, Jr., Thomas L. 3630 Peachtree Rd. NE, Unit 2304 Atlanta, ga 30326	05/13/2014 Monetary	a. Banking b. State Bank and Trust Company	2014 Primary	\$250.00	\$0.00
Campaign to elect Tommy Benton 177 Martin St. Jefferson, ga 30549	06/30/2014 Monetary		2014 Run-Off Primary	\$300.00	\$0.00

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Cash America 1600 West 7th St., Fort Worth, TX 76102	06/30/2014 Monetary		2014 Run-Off Primary	\$250.00	\$0.00
Chastcen, James S. 2633 Birchwood Cr. NE Atlanta, ga 30305	05/22/2014 Monetary	a. Small Business Owner b. Self	2014 Primary	\$200.00	\$0.00
Check into Cash of Georgia, LLC 2501 Keith St. SW. Ste. 80 Cleveland, tn 37311	06/09/2014 Monetary		2014 Primary	\$500.00	\$0.00
Civil Justice PAC 101 Marietta St. NW, Ste. 3350 Atlanta, ga 30360	04/14/2014 Monetary		2014 Primary	\$2,000.00	\$0.00
Civil Justice PAC, Inc 101 Marietta St. NW Ste. 3350 Atlanta, ga 30303	06/19/2014 Monetary		2014 General	\$2,000.00	\$0.00
Closson Jr., Luke E. 112 Central Ave. Valdosta, ga 31601	04/24/2014 Monetary	a. Businessman b. Self	2014 Primary	\$250.00	\$0.00
Coleman Tally LLP 3475 Lenox Rd. NE, Ste 400 Atlanta, ga 30326	05/07/2014 Monetary		2014 Primary	\$500.00	\$0.00
Commerce Political Action Coimmittee 235 Andrew Young Int'l Blvd. NW Atlanta, ga 30303	05/07/2014 Monetary		2014 Primary	\$1,000.00	\$0.00
Committee for Responsible Health Care Policy 1231 Collier Rd. NW, Ste. J Atlanta, ga 30318	06/29/2014 Monetary		2014 Run-Off Primary	\$1,000.00	\$0.00
Committee to Elect Renee Unterman P. O. Box 508 Buford, ga 30515	04/11/2014 Monetary		2014 Primary	\$1,000.00	\$0.00

Connell, Phillip 388 Good Hope Circle Naylor, Ga 31641	04/05/2014 Monetary	a. Businmessman b. Self	2014 Primary	\$2,500.00	\$0.00
Conner, Marshall & Gwen 4811 Hunters Crossing Valdosta, ga 31602	04/29/2014 Monetary	a. Retired b. Georgia Power	2014 Primary	\$200.00	\$0.00
Crawford, John 1500 N. Patterson St. Valdosta, ga 31698	04/18/2014 Monetary	a. Administrator b. Valdosta State University	2014 Primary	\$200.00	\$0.00
Delta PAC P. O. Box 20706 Atlanta, ga 30320	05/07/2014 Monetary		2014 Primary	\$250.00	\$0.00
Doughty, Steve 9050 Old Southwick Pass Alpharetta, ga 30022	05/13/2014 Monetary	a. Banking b. State Bank and Trust Company	2014 Primary	\$200.00	\$0.00
Doyle, Mike 720 Spalding Dr. NE Atlanta, ga 30326	05/13/2014 Monetary	a. Investment Advisor b. Aurora Investment Counsel	2014 Primary	\$250.00	\$0.00
Dupree, Reed 1401 35th St. NW Washington, DC 20007	05/13/2014 Monetary	a. Private Equity Fund Analyst b. GMT Capital	2014 Primary	\$200.00	\$0.00
Dyson, Billy 7125 Grand Reunion Dr. Hoschton, GA 30548	05/13/2014 Monetary	a. Small Business Owner b. Georgia Hardwoods, Inc.	2014 Primary	\$500.00	\$0.00
Dyson, Bob 8015 Derbyshire Ct. Duluth, Ga 30097	05/13/2014 Monetary	a. Small Business Owner b. Georgia Hardwoods, Inc.	2014 Primary	\$500.00	\$0.00
Ellis Black Campaign 5900 Jumping Gully Rd. Valdosta, ga 31601	05/16/2014 Monetary		2014 Primary	\$1,500.00	\$0.00

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Evans, Joe 4270 W. Club Ln. NE Atlanta, ga 30319	05/13/2014 Monetary	a. Banking b. State Bank and Trust Company	2014 Primary	\$500.00	\$0.00
ForestPAC P. O. Box 1217 Forsyth, ga 31029	04/10/2014 Monetary		2014 Primary	\$500.00	\$0.00
Friends of Budy Carter for Senate P. O. Box 222 Pooler, ga 31322	06/28/2017 Monetary		2014 Run-Off Primary	\$500.00	\$0.00
Ga. Bankers Asso. 50 Hurt Plaza. ste. 1050 Atlanta, ga 30303	06/24/2014 Monetary		2014 Primary	\$500.00	\$0.00
Ga. Bankers Asso. 50 Hurt Plaza, Ste 1050 Atlanta, ga 30303	04/26/2014 Monetary		2014 Primary	\$500.00	\$0.00
Ga. Branch associated Gen. Contractors PAC 1940 The Exchange Atlanta, ga 30339	04/30/2014 Monetary		2014 Primary	\$500.00	\$0.00
Ga. Branch associated Gen. Contractors PAC 19401 The Exchange Atlanta, ga 30339	06/21/2014 Monetary		2014 Primary	\$500.00	\$0.00
GAE Fund for Public Education 100 Crescent Ctr. Parkway, ste. 500 Tucker, ga 30084	05/09/2014 Monetary		2014 Primary	\$500.00	\$0.00
Georgia Amusement & Music Operators Asso. Political Action Committee 3780 Old Norcross Rd., Ste 103 PMB521 Duluth, ga 30096	05/07/2014 Monetary		2014 Primary	\$500.00	\$0.00
Georgia Association of Realtors PAC 3200 Presidential Dr. Atlanta, ga 30340	04/16/2014 Monetary		2014 Primary	\$1,000.00	\$0.00

Georgia Association of Realtors PAC 3200 Presidential Dr. Atlanta, ga 30340	06/14/2014 Monetary		2014 Run-Off Primary	\$1,300.00	\$0.00
Georgia Better Government Fund 8601 Dunwoody Place, Ste. 3108 Atlanta, ga 30350	06/30/2014 Monetary		2014 Run-Off Primary	\$500.00	\$0.00
Georgia Chamber of Commerce State PAC, Inc 270 Peachtree St. NW, Ste 2200 Atlanta, ga 30303	06/28/2014 Monetary		2014 Run-Off Primary	\$500.00	\$0.00
Georgia Chamber of Commerce State PAC, Inc 270 Peachtree St. NW Ste. 2200 Atlanta, ga 30303	05/07/2014 Monetary		2014 Primary	\$250.00	\$0.00
Georgia Chemistry Council 1995 N. Park Place, Ste. 240 Atlanta, ga 30330	06/24/2014 Monetary		2014 Run-Off Primary	\$250.00	\$0.00
Georgia Dental Asso. 3490 Piedmont Rd. NE Ste. 110 Atlanta, ga 30305	04/12/2014 Monetary		2014 Primary	\$500.00	\$0.00
Georgia BMC PAC 2100 East Exchange Place # 509 Tucker, ga 30084	05/02/2014 Monetary		2014 Primary	\$500.00	\$0.00
Georgia Emergency Medicine PAC 6134 Popular Bluff Circle, Ste 101 Norcross, ga 30092	05/02/2014 Monetary		2014 Primary	\$500.00	\$0.00
Georgia Hardwoods, Inc. 3061 Verona Ave. Buford, Ga 30518	05/13/2014 Monetary		2014 Primary	\$1,000.00	\$0.00
Georgia Highway Contractors Assoc. & Georgia Asphalt Pavement Association PAC 2160 Satellietg Blvd. Ste. 100 Duluth, ga 30097	06/24/2014 Monetary		2014 Run-Off Primary	\$500.00	\$0.00

Georgia Oilmen's Asso. 1775 Spectrum Dr. Ste. 100 Lawrenceville, Ga 30043	04/05/2014 Monetary		2014 Primary	\$500.00	\$0.00
Georgia Poultry Federation PAC P. O. Box 763 Gainesville, ga 30503	06/30/2014 Monetary		2014 Run-Off Primary	\$500.00	\$0.00
Ginn, Frank 5407 Wildcat Bridge Rd. Royston, ga 30662	06/30/2014 Monetary	a. State Senator b. State of Georgia	2014 Run-Off Primary	\$1,000.00	\$0.00
Government Solutions LLC 1118 Aston Bluff Dr. NE Atlanta, ga 30319	06/24/2014 Monetary		2014 Run-Off Primary	\$250.00	\$0.00
GPhA PAC 50 Lenox Pointe NE Atlanta, ga 30324	06/14/2014 Monetary		2014 Primary	\$250.00	\$0.00
Greene, Chris 3180 Le Conte Ave. NE Atlanta, Ga 30319	05/13/2014 Monetary	a. Attorney b. McGuireWoods, LLP	2014 Primary	\$200.00	\$0.00
GUCA Political Action Committee 804 Main St., Ste C Forest park, ga 30297	05/02/2014 Monetary		2014 Primary	\$500.00	\$0.00
Hamilton, Jr, Robert P. O. Box 674523 Marietta, Ga 30006	05/13/2014 Monetary	a. Insurance sales b. IOA USA, Inc	2014 Primary	\$250.00	\$0.00
helms, Jeff & Cathy P. O. Box 537 HOMERVILLE, GA 31634	06/19/2014 Monetary	a. attorney b. Self	2014 Primary	\$500.00	\$0.00
Hobbs, Terry P. O. Box 54578 Atlanta, ga 30308	06/30/2014 Monetary	a. Lobbyist b. Multiple Clients	2014 Run-Off Primary	\$500.00	\$0.00

HosPAC 1675 Terrell Mill Rd. Marietta, ga 30067	06/24/2014 Monetary		2014 Run-Off Primary	\$1,000.00	\$0.00
HosPAC 1675 Terrell Mill Rd. Marietta, ga 30067	04/22/2014 Monetary		2014 Primary	\$1,000.00	\$0.00
IIA of Georgia, Inc 3186 Chestnut dr. Connector Doraville, Ga. 30340	04/05/2014 Monetary		2014 Primary	\$1,000.00	\$0.00
IIA of Georgia, Inc 3186 Chestnut Dr. Connector Doraville, ga 30340	05/30/2014 Monetary		2014 Primary	\$1,000.00	\$0.00
Jason Shaw Campaign Committee P. O. Box 245 Lakeland, ga 31635	05/15/2014 Monetary		2014 Primary	\$1,000.00	\$0.00
John D. Bulloch, Jr. Senate Campaign 3554 bULLOCH rD. oCHLOCKNEE, GA 31773	04/15/2014 Monetary		2014 Primary	\$1,000.00	\$0.00
John Deere Political Action Committee One John Deere Place Moline, IL 61265	05/16/2014 Monetary		2014 Primary	\$500.00	\$0.00
Lake Park farmhouse Restaurant P. O. box 992 Lake Park, Ga. 31636	04/05/2014 Monetary		2014 Primary	\$250.00	\$0.00
Langdale III, William Pope 400 Mack Dr. Valdosta, ga 31602	04/14/2014 Monetary	a. Lawyer b. Self	2014 Primary	\$500.00	\$0.00
Lindvig, Jonathan 789 Twilley Ridge Rd. SW Smyrna, Ga 30082	05/13/2014 Monetary	a. Financial Advisor b. Principal Wealth Advisors, Inc.	2014 Primary	\$250.00	\$0.00

Lovein, Matthew 91 Blackland Dr. Atlanta, ga 30342	06/08/2014 Monetary	a. Insurance Sales b. Ironwood Insurance Services	2014 Primary	\$150.00	\$0.00
MBAG - Good Government Fund P. O. Box 801 Macon, ga 31202	04/26/2014 Monetary		2014 Primary	\$500.00	\$0.00
Miller, Martin P. O. Box 15593 Savannah, ga 31416	04/25/2014 Monetary	a. Businessman b. Self	2014 Primary	\$500.00	\$0.00
Monsanto Company 800 North Lindbergh St. Louis, mo 63167	05/03/2014 Monetary		2014 Primary	\$250.00	\$0.00
Neighbors for Sterling, Inc P. O. box 76153 Sandy Springs, ga 30358	06/14/2014 Monetary		2014 Primary	\$125.00	\$0.00
Nichols, Matt 383 Porter St. Madison, ga 30650	05/13/2014 Monetary	a. Attorney b. Sutherland, Asbill & Brennan, LLP	2014 Primary	\$300.00	\$0.00
Packing Corporation of America P. O. Box 1048 Valdosta, ga 31603	05/15/2014 Monetary		2014 Primary	\$1,000.00	\$0.00
Panizzi, Giovanni P. O. box 3782 Valdosta, ga 31604	05/06/2014 Monetary	a. Businessman b. Self	2014 Primary	\$250.00	\$0.00
Pickels, Curtis 610 N. Laurel St. Quitman, ga 31643	06/17/2014 Monetary	a. Druggist b. self	2014 Primary	\$2,500.00	\$0.00
Pickels, Curtis 610 N. Laurel St. Quitman, ga 31643	06/17/2014 Monetary	a. Druggist b. Self	2014 Primary	\$500.00	\$0.00

Powell for Representative P. O. box 188 Camilla, ga 31730	05/09/2014 Monetary		2014 Primary	\$1,000.00	\$0.00
Pulliam, David 3889 Fairfax Ct. SE Aqtlanta, ga 30339	05/22/2014 Monetary	a. Investment Advisor b. Pulco Capital Management, LLC	2014 Primary	\$250.00	\$0.00
Roundtree, Bill 6898 Miller Bridge Rd. Hahira, Ga 31632	04/05/2014 Monetary	a. Businessman b. Self	2014 Primary	\$1,000.00	\$0.00
Royal Consulting P. O. box 607 Camilla, ga 31730	05/13/2014 Monetary		2014 Primary	\$200.00	\$0.00
Senator Jack Hill Campaign P. O. box 486 Reidsville, Ga. 30453	04/05/2014 Monetary		2014 Primary	\$500.00	\$0.00
Senator Jack Hill Campaign P. O. box 486 Reidsville, ga 30453	06/08/2014 Monetary		2014 Primary	\$500.00	\$0.00
Senator Jeff Mullis Victory Account 212 English Ave. Chickamcuga, ga 30707	05/11/2014 Monetary		2014 Primary	\$500.00	\$0.00
Service Copooration International Political Action Committee P. O. Box 130548 Houston, tx 77219	06/24/2014 Monetary		2014 Run-Off Primary	\$500.00	\$0.00
SFA PAC Inc 1355 Peachtree St. NE, Ste. 300 Atlanta, ga 30309	06/27/2014 Monetary		2014 Run-Off Primary	\$1,000.00	\$0.00
Shaw, James S. 311 Valdosta Hwy. Lakeland, ga 31635	04/21/2014 Monetary	a. Retired b. Self	2014 Primary	\$250.00	\$0.00

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Southeastern Milk P. O. Box 3790 Bellview, fl 34421	05/05/2014 Monetary		2014 Primary	\$250.00	\$0.00
Southeastern Regional Medical Center 600 Parkway North Newnan, ga 30263	05/13/2014 Monetary		2014 Primary	\$1,000.00	\$0.00
Southern Cropo Production Assn. P. O. Box 7000 Dawsonb, ga 39842	06/16/2014 Monetary		2014 Primary	\$1,000.00	\$0.00
Suntrust Good government group P. O. Box 4418 Atlanta, ga 30302	06/24/2014 Monetary		2014 Run-Off Primary	\$250.00	\$0.00
Suntrust Good government group p. o. BOX 4418 aTLAANTA, GA 30302	05/07/2014 Monetary		2014 Primary	\$250.00	\$0.00
The Coca-Cola Company Georgia Political Action Fund P. O. box 1734 Atlanta, ga 30301	05/01/2014 Monetary		2014 Primary	\$750.00	\$0.00
The PAC of Wine & Spirits Wholesalers of Ga. 3565 Piedmont Rd. NE 2 Piedmont Center, Ste. 320 Atlanta, ga 30305	06/24/2014 Monetary		2014 Run-Off Primary	\$750.00	\$0.00
Tim Golden for Senate P. O. box 1251 Valdosta, ga 31604	06/18/2014 Monetary		2014 Run-Off Primary	\$1,250.00	\$0.00
Tim Golden for Senate P. O. Box 1251 Valdosta, ga 31604	06/08/2014 Monetary		2014 General	\$2,000.00	\$0.00
Tim Golden for Senate P. O. Box 1251 Valdosta, ga 31604	04/09/2014 Monetary		2014 Primary	\$2,500.00	\$0.00

United Health Services of Georgia PAC, INC P. O. Box 1210 Toccoa, ga 30577	05/22/2014 Monetary		2014 Primary	\$1,500.00	\$0.00
UPSPAC 55 Glenlake Pkwy. NE Atlanta, ga 30328	05/12/2014 Monetary		2014 Primary	\$1,000.00	\$0.00
Voigt's Sheet Metal Works, Inc. 2011 Springhill Dr. Valdosta, ga 31602	05/01/2014 Monetary		2014 Primary	\$2,500.00	\$0.00
Vyas, Ankur 1649 Duncan Dr. NW Atlanta, ga 30318	06/08/2014 Monetary	a. Banking b. Sun Trust Bank	2014 Primary	\$101.00	\$0.00
Wells Fargo & Co. Georgia Employees Good government Fund 150 S. Monroc Ste. Ste. 3069 Tallahassee, fl 32301	05/17/2014 Monetary		2014 Primary	\$300.00	\$0.00
Weltzbarker, Doyle 301 Plantation Dr. Quitman, ga 31643	06/17/2014 Monetary	a. Buisnessman b. self	2014 Primary	\$1,000.00	\$0.00
Weyerhacuser P. O. Box 9769 Federal Way, Wa 98063	05/08/2014 Monetary		2014 Primary	\$750.00	\$0.00
Wiley, Thomas 190 Green Island Rd. Savannah, ga 31411	05/13/2014 Monetary	a. Banking b. State BVank and Trust Company	2014 Primary	\$250.00	\$0.00
Workplace Injury Network Political Action Committee, Inc 3155 Roswell Rd., NE, Ste 210 Atlanta, ga 30305	04/25/2014 Monetary		2014 Primary	\$2,500.00	\$0.00

State of Georgia
Campaign Contribution Disclosure Report
Summary of Itemized Contributions Received

In-Kind Total for this period:	\$0.00
Cash Contributions Total for this period:	\$81,876.14

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Burrell & Co. LLC 5061 Hodgkins Pl. SW Lilburn, GA 30047	05/22/2014 Expenditure		Robo call	\$879.68
Citizens Community Bank P. O. Box 338 Hahira, GA 31632	04/02/2014 Expenditure		Checks, Deposit Books and Notebook	\$121.41
Cook Publishing P. O. Box 1500 Adel, GA 31692	05/02/2014 Expenditure		Advertisement	\$1,061.40
Crawford, Tom 566 Lakeshore Dr. Atlanta, GA 30307	06/27/2014 Expenditure	a. Newsletter Publisher b. Self	Newsletter Fee	\$199.00
Fairway Outdoor Advertising 369 Enterprise Dr. Valdosta, GA 31601	05/08/2014 Expenditure		Billboard Advertising	\$1,499.96
Home Grown Ga. 968 Memorial Dr. Atlanta, GA 30316	04/17/2014 Expenditure		Food for Fundraiser	\$702.00
Home Grown Ga. 968 Memorial Dr. Atlanta, GA 30316	05/06/2014 Expenditure		Food for Fundraiser	\$540.00
Howard N. Mead Co. 530 Rock Spring St. NE Atlanta, GA 30306	05/14/2501 Expenditure		TV Ad	\$10,260.00
Howard N. Mead Co. 530 Rock Spring Ct. NE Atlanta, GA 30306	06/26/2014 Expenditure		TV Ad	\$2,675.00
Lake Park Area Chamber of Commerce P. O. Box 278 Lake Park, GA 31636	06/12/2014 Expenditure		Advertisement	\$350.00
Lakeland Lanier Co. Chamber of Commerce P. O. Box 215 Lakeland, GA 31635	04/23/2014 Expenditure		Donation	\$125.00
Linkin 2029 Sterlin Ct. Mountain View, CA 94043	03/24/2014 Expenditure		Advanced Membership	\$239.40
Lowe's P. O. Box 530914 Atlanta, GA 30353	06/27/2014 Expenditure		Material for Signs	\$251.66
North Star Opinion research 112 North Alfred St. Alexandria, VA 22314	05/02/2014 Expenditure		Pol	\$4,500.00

North Star Opinion Research 112 North Alfred St. Alexandria, VA 22314	04/03/2014 Expenditure		Poll	\$4,500.00
Parlay Political LLC P. O. Box 1386 Athens, GA 30606	05/08/2014 Expenditure		Mailings	\$7,999.52
Parlay Political LLC P. O. Box 13869 Athens, GA 30606	05/12/2014 Expenditure		Design, Production and Buildout of Smart Site	\$3,090.00
Parlay Political LLC P. O. Box 1386 Athens, GA 30606	05/12/2014 Expenditure		Consulting Fee	\$1,000.00
Parlay Political, LLC P. . Box 1386 Athens, GA 30606	04/23/2014 Expenditure		Political Mailing	\$8,438.54
Parlay Political, LLC P. O. Box 1386 Athens, GA 30606	05/08/2014 Expenditure		Consultant Fee	\$500.00
Parlay Political, LLC P. O. Box 1385 Athens, GA 30606	06/30/2014 Expenditure		Ad Preparation	\$309.00
Peliton Plastics 130 Blanchard St. Valdosta, GA 31601	04/01/2014 Expenditure		Yard Signs	\$1,750.00
Public Opinion Strategies, LLC 214 North Fayette St. Alexandria, VA 22314	04/03/2014 Expenditure		Poll	\$6,500.00
Roger Budd Company 2907 N. Patterson St. Valdosta, GA 31602	04/24/2014 Expenditure		Billboard Advertising	\$1,906.00
Roger Budd Company 2907 N. Patterson St. Valdosta, GA 31602	06/13/2014 Expenditure		Advertisement	\$912.00
Small Town Broadcasting 118 N. Patterson St. Valdosta, GA 31602	06/18/2014 Expenditure		Advertisement	\$360.00
Smalltown Broadcasting, Inc 118 N. Patterson St Valdosta, GA 31602	05/02/2014 Expenditure		Advertisement	\$1,080.00
Staley, Vicki 3393 Palm Circle Kennesaw, GA 30144	04/18/2014 Expenditure	a. Independant Contractor b. Self	Organize Fundraiser	\$750.00

Staley, Vicki 3393 Palm Circle Kennesaw, GA 30144	04/14/2014 Expenditure	a. Independent Contractor b. Self	Organize Fundraiser	\$750.00
State YMCA P. O. box 820 McDonough, GA 30253	03/24/2014 Expenditure		Donation	\$200.00
Strickland Brockington Lewis, LLP Midtown Proscenium Ste. 2200 Atlanta, GA 30309	04/21/2014 Expenditure		Legal fees to incorporate Campaign	\$1,260.96
The Clinch County News P. O. Box 377 Homerville, GA 31634	05/02/2014 Expenditure		Advertisement	\$906.00
The Clinch County News P. O. Box 377 Homerville, GA 31634	06/08/2014 Expenditure		Advertisement	\$1,245.00
The Clinch County News P. O. Box 377 Homerville, GA 31634	04/11/2014 Expenditure		Advertisement	\$115.50
Thomasville Times Enterprise P. O. Box 650 Thomasville, GA 31799	07/28/2014 Expenditure		Advertisement	\$535.00
Thomasville Times Enterprise P. O. box 650 Thomasville, GA 31799	04/03/2014 Expenditure		Subscription	\$155.88
Thomasville Thomas Co. Chamber of Commerce 401 S. Broad St. Thomasville, GA 31799	05/14/2014 Expenditure		Dues	\$195.00
U S Press 1628 James P. Rodgers Dr. Valdosta, GA 31601	05/02/2014 Expenditure		Postage	\$283.74
U S Press 1628 James P. Rodgers Dr. Valdosta, GA 31601	05/05/2014 Expenditure		Printing and Mailing Letter	\$1,015.43
U S Press 1628 James P. Rodgers Dr. Valdosta, GA 31601	04/01/2014 Expenditure		Signs	\$2,942.50
U S Press 1628 James P. Rodgers Dr. Valdosta, GA 31601	05/30/2014 Expenditure		Signs	\$816.41
U S Press 1628 James P. Rodgers Dr. Valdosta, GA 31601	04/11/2014 Expenditure		Magnetic Signs	\$185.11

US Press 1628 James P. Rodgers Dr. Valdosta, GA 31601	04/11/2014 Expenditure		Yard Signs	\$2,113.25
Valdosta Daily times P. O. Box 968 Valdosta, GA 31603	04/24/2014 Expenditure		Advertisement	\$560.50
Valdosta Daily times P. O. box 968 Valdosta, GA 31603	04/28/2014 Expenditure		Advertisement	\$921.13
Valdosta Daily times P. O. Box 968 Valdosta, GA 31603	04/24/2014 Expenditure		Advertisement	\$302.50
Valdosta Daily Times P. O. Box 968 Valdostaa, GA 31603	05/16/2014 Expenditure		Advertisement	\$1,025.50
Valdosta Daily Times P. O. box 968 Valdosta, GA 31603	05/05/2014 Expenditure		Advertisement	\$863.00
Valdosta Daily Times P. O. Box 968 Valdosta, GA 31603	05/18/2014 Expenditure		Advertisement	\$125.00
Valdosta Daily Times P. O. Box 968 Valdosta, GA 31603	06/16/2014 Expenditure		Advertisement	\$395.00
Valdosta Daily Times P. O. Box 968 Valdosta, GA 31603	06/10/2014 Expenditure		Advertisement	\$125.00
Valdosta DSaily Times P. O. Box 968 Valdosta, GA 31603	05/08/2014 Expenditure		Advertisement	\$1,782.12
VSU Foundation 1500 N. Patterson St. Valdosta,, GA 31602	05/08/2014 Expenditure		Donation	\$200.00
WGOV 2973 Hwy 84 W Valdosta, GA 31602	04/28/2014 Expenditure		Advertisement	\$903.00
WGOV 2973 Hwy 84 W Valdosta, GA 31602	05/02/2014 Expenditure		Advertisement	\$2,064.00

18024442081

State of Georgia Campaign Contribution Disclosure Report

1. Report Type Original Report	2. Filing is being made on behalf of: Candidate or Public Official C2006000369 - C. Ellis Black State Representative, District 174	Filing Office Use Only E-Filed on 7/2/14 5:52 am Use Earliest of Post Mark or Hand Delivered Date
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3. Identifying and Contact Information

(1) C. Ellis Black (2) 07/02/2014
Full Name of Candidate or Non-Candidate Campaign Committee *Today's Date*

(3) 5900 Jumping Gully Rd. Valdosta, GA 31601
Mailing Address

(4) (229) 559-7516
Contact Phone Number (We will understand the release of this information as permission to call your office if necessary.)

(5) If a Candidate or Public Official, is there a campaign committee (one or more persons) to make campaign transactions, keep the financial records of the campaign, or file the reports? **NO** (6) If so, is the Committee registered with the State Ethics Commission? **NO**

(7) _____
Name of Chairperson and / or Treasurer of Committee

4. Period for which you are Reporting

My Non Election Year	My Election Year	Run-Offs <small>(Report Requires Only if you are in a Run Off Election)</small>	Special Elections <small>(Report Requires Only if you are in a Special Election)</small>
<input type="checkbox"/> January 31, 2014 <input type="checkbox"/> June 30, 2014 Supplemental Reporting <input type="checkbox"/> June 30, 2014 <input type="checkbox"/> December 31, 2014 <small>*Persons leaving office with excess funds until such funds are expended as provided in the Act *Unsuccessful candidates with excess funds, or who receive contributions to retire debt incurred, until such funds are expended, or such</small>	<input type="checkbox"/> January 31, 2014 <input type="checkbox"/> March 31, 2014 <input checked="" type="checkbox"/> June 30, 2014 <input type="checkbox"/> September 30, 2014 <input type="checkbox"/> October 25, 2014 <input type="checkbox"/> December 31, 2014	<input type="checkbox"/> 6 days before Primary Run-Off, 2014 <input type="checkbox"/> 6 days before General Run-Off, 2014 <input type="checkbox"/> 6 days before Special Primary Run-Off, 2014 <input type="checkbox"/> 6 days before Special Run-Off, 2014	<input type="checkbox"/> 15 days before Special Primary, 2014 <input type="checkbox"/> 15 days before Special, 2014 <input type="checkbox"/> Dec. 31, 2014

The electronic filing of this document constitutes an affirmation that the statement is true, complete, and correct. As per modifications of the Ethics in Government Act, filing a separate notarized affidavit is no longer required. See O.C.G.A. §§ 21-5-34.1(e) and 21-5-50(e).

180044440001

**State of Georgia
Campaign Contribution Disclosure Report
Loan Reporting**

Name of Lender Mailing Address	Date of Loan Amount of Loan Election Cycle	Person(s) responsible for repayment of loan Mailing Address	Occupation & Place of Employment Fiduciary Relationship
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I have no loans to report this reporting period.

18044442110

**State of Georgia
Campaign Contribution Disclosure Report
Investments Statement**

Investment Name **There are No Investments this reporting period**

**Institution/Person
Holding Account**

Address

Address

City, State, Zip

There are No Investments this reporting period

Account Number

Value at beginning of reporting period

Value at end of reporting period

Cash Dividends

Interest Paid Out

Investment Transactions

18004440081

**State of Georgia
 Campaign Contribution Disclosure Report
 Summary Report**

CONTRIBUTIONS RECEIVED

1	I Have: No contributions to report.	<u>In-Kind Estimated Value</u>	<u>Cash Amount</u>
2	Total contributions previously reported.	\$0.00	\$80,790.86
3	Total amount of all itemized contributions received in this reporting period which are listed on the "Itemized Contributions" page.	\$0.00	\$0.00
3a	All loans received this reporting period.		\$0.00
3b	Interest earned on campaign account this reporting period.		\$0.00
3c	Total amount of investments sold this reporting period.		\$0.00
3d	Total amount of cash dividends and interest paid out this reporting period.		\$0.00
4	Total amount of all separate contributions of \$100.00 or less received in this reporting period and not listed on the "Itemized Contributions" page. "Common Source" contributions must be aggregated on the "Itemized Contributions" page.	\$0.00	\$0.00
5	Total contributions reported this reporting period. (Line 3 + 3a + 3b + 3c + 3d + 4)	\$0.00	\$0.00
6	Total contributions to date. (Line 2 + 5)	\$0.00	\$80,790.86

EXPENDITURES MADE

7	I Have: The following expenditures to report:	<u>In-Kind Estimated Value</u>	<u>Cash Amount</u>
8	Total expenditures made and reported prior to this reporting period.	\$0.00	\$3,150.00
9	Total amount of all itemized expenditures made in this reporting period which are listed on the "Itemized Expenditures" page.	\$0.00	\$10,250.00
10	Total amount of all separate expenditures of \$100.00 or less each that were made in this reporting period and not listed on the "Itemized Expenditures" page.	\$0.00	\$0.00
11	Total expenditures reported this reporting period. (Line 9 + 10)	\$0.00	\$10,250.00
12	Total expenditures to date. (Line 8 + 11)	\$0.00	\$13,400.00

INVESTMENTS

13	Amount of investments at the beginning of this reporting period.		\$0.00
14	Total amount of investments at the close of this reporting period.		\$0.00

15	Net Balance On Hand. (Line 6 - 12 + 14)		\$67,390.86
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**State of Georgia
Campaign Contribution Disclosure Report
Loan Reporting**

Name of Lender Mailing Address	Date of Loan Amount of Loan Election Cycle	Person(s) responsible for repayment of loan Mailing Address	Occupation & Place of Employment Fiduciary Relationship
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I have no loans to report this reporting period.

1804444216

**State of Georgia
Campaign Contribution Disclosure Report
Itemized Expenditures**

Must list expenditures made to a single recipient for which the aggregate total is more than \$100.00

List Name and Mailing Address of Recipient	Expenditure Date Expenditure Type	Occupation & Employer	Expenditure Purpose	Amount Paid
Boston Gin P. O. box 340 Boston, GA 31626	06/17/2014 Refund		Reimburse Contribution	\$750.00
Brooksco Dairy Inc P. O. Box 508 Quitman, GA 31643	06/17/2014 Refund		Reimburse Contribution	\$1,000.00
Buddy Carter for Congress P. O. Box 222 Pooler, GA 31322	06/27/2014 Expenditure		Contribution	\$500.00
Ellis Black for Senate Inc 5900 Jumping Gully Rd. Valdosta, GA 31601	05/16/2014 Expenditure		Contribution	\$1,500.00
Ellis Black for Senate, Inc 5900 Jumping Gully Rd. Valdosta, GA 31601	04/01/2014 Expenditure		Contribution	\$1,000.00
Pickels, Curtis 610 N. Laurel St. Quitman, GA 31643	06/17/2014 Refund	a. Drugist b. Self	Reimburse Contribution	\$2,500.00
Roundtree, Bill 6898 Miller Bridge Rd. Habersham, GA 31632	04/14/2014 Refund	a. Businessman b. Self	Reimburse Contribution	\$1,000.00
Southern Crop Protection Asso. P. O. Box 7000 Dawson, GA 39842	06/19/2014 Refund		Reimburse Contribution	\$1,000.00
Weltzbarker, Doyle 301 Plantation Dr. Quitman, GA 31643	06/17/2014 Refund	a. Businessman b. Self	Reimburse Contribution	\$1,000.00

FILER ID: C2006000369

**State of Georgia
Campaign Contribution Disclosure Report
Summary of Itemized Expenditures Made**

Paid Expenditures Total for this period: **\$10,250.00**

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**State of Georgia
Campaign Contribution Disclosure Report
Investments Statement**

Investment Name **There are No Investments this reporting period**

**Institution/Person
Holding Account**

**Address
Address**

City, State, Zip

There are No Investments this reporting period

Account Number

Value at beginning of reporting period

Value at end of reporting period

Cash Dividends

Interest Paid Out

Investment Transactions

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